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7/26/85

STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

TO: File

FROM: C. R. Clinton

SUBJECT: HW - Rhone Poulenc, Inc.
Hazardous Waste Inspection

DATE: July 26, 1985

Hazardous Waste Division
Dept. of Environmental Quality
RECEIVED
AUG 6 1985

At approximately 1:40 p.m. on June 13, 1985 a compliance inspection was begun at the Rhone Poulenc, Inc. facility located at 6200 NW St. Helens Road, Portland, Oregon, 97210. The plant was found to be generally in compliance with the hazardous waste regulations except for some minor violations.

Participants in the June 13, 1985 inspection were:

1. Robert L. Ferguson, Plant Manager
2. Don R. Meyer, Production Supervisor
3. Michael J. Downs, Administrator, Hazardous and Solid Waste Division, DEQ
4. Peter K. Ressler, Northwest Region Office, DEQ
5. Charles R. Clinton, Northwest Region Office, DEQ

The facility began operation in 1943, as a plant which mixed pesticide dusts. The facility was expanded in 1956 by the addition of a plant to make chlorinated herbicides, including 2,4-D and 2,4,5-T. The production of 2,4,5-T was stopped in the mid-Sixties. The production of the chlorinated herbicides was stopped in June of 1982.

Currently, the plant is only manufacturing bromoxynil octanoate, which is a bromine based herbicide. The bromoxynil octanoate is used to make two products. It is used alone to produce Buctril. It is mixed with 4-chloro-2-2-methyl phenoxyacetic acid (MCPA) to make a product called Bronate. The MCPA is not manufactured on the site but is shipped in from another Rhone Poulenc plant.

Bromoxynil octanoate is produced in a reactor by combining cyano phenol acetate, bromine and sodium chlorate. The product of this reaction is filtered, concentrated, esterfied, washed, and dehydrated to produce the final product.

Waste streams produced at this facility include:

1. Process waste water is discharged to the City of Portland's sanitary sewer after pretreatment by activated carbon.

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2. Rain water runoff from the plant site storm drains is treated on-site. Treatment consists of biological removal followed by carbon filtration. After treatment, the water is discharged to the Willamette River.
3. Contaminated groundwater which is being removed from underneath the plant via a system of 10 wells. This water goes through the same treatment as item number 2 and is discharged to the Willamette River. The company has been pumping groundwater from this well system for about a year.
4. Bromoxynil octanoate filter wastes which are shipped for disposal to CSSI, Arlington, Oregon. Approximately 12 drums of this material per year are generated. This waste consists of diatomaceous earth filter paper which is used to filter the bromoxynil octanoate. A Uniform Manifest is used for shipments which are transported by CSSI.
5. Bromoxynil octanoate pit sludge which is taken to CSSI, Arlington. Approximately 4 to 5 drums are generated per year. This is a material that settles out in a waste water pit. The water that enters this pit is floor wash water which is pumped to the company's treatment plant. A Uniform Manifest is used for shipments which are transported by CSSI.
6. Lab waste taken to CSSI, Arlington. Approximately 6 drums per year are generated. The waste consists of broken chemical and sample bottles, unused samples and solvents. The different wastes are kept in separate drums. A Uniform Manifest is used for shipments which are transported by CSSI.
7. Contaminated equipment which is taken to CSSI, Arlington. Approximately 100 drums per year of this material was generated last year. Much less than this will probably be generated this next year because the company has been removing 2-4-D process equipment which was no longer used or needed. The material is insulation, pipes, sheetmetal and equipment parts which have been contaminated. This material is generally put in drums, but if it is too long for the drums, it is wrapped in plastic. A Uniform Manifest is used for shipments which are transported by CSSI.
8. Spent carbon which is returned to Calgon Corporation for recycling. Approximately 300,000 pounds per year of this material is generated. This material is transported by Calgon by tank truck. It is recycled by facilities in either Pennsylvania or Kentucky. A Uniform Manifest is used.

File - Rhone Poulenc, Inc.
July 26, 1985
Page 3

The company's hazardous waste manifests were reviewed and only minor violations were noted. On all the recent manifests for the spent carbon the Department of Transportation description was not correct. The description used was "hazardous waste solid ORM-E NA-9189;" the correct description should be "hazardous waste, solid, n.o.s., ORM-E, NA9189."

The preparedness and prevention plans for the facility were reviewed. The plant has an automatic sprinkler system in the building where the hazardous waste is stored. They also have fire extinguishers and fire hoses located in that building. There is an alarm which can be activated for emergencies. The building has a telephone which can be used for summoning emergency assistance. Emergency communication and response equipment is tested once a week to make sure that it is operating properly. In addition, the company has made arrangements with the City of Portland Police, City of Portland Fire Bureau, Emanuel Hospital, Physicians and Surgeons Hospital, Sanderson's Safety Supply Company, Crosby and Overton, and Environmental Emergency Services (Riedel Environmental Services) to respond to emergencies and spills.

We next conducted an inspection of the plant's hazardous waste facilities. The first area visited was the storage tanks for the spent carbon. This area meets all the requirements of the regulations except that the tank does not have a label on it.

We next inspected the drum storage area. We found that there were 9 drums in storage. The date on the oldest drum was 4/4/85. Wastes in the storage area included the following:

1. Two drums of asbestos contaminated with chlorinated herbicides
2. One drum of bromoxynil octanoate filtrate waste
3. Four drums of contaminated equipment
4. Two drums of lab wastes

The drum storage area had adequate aisle spacing of approximately 50 inches. The warehouse area drains to a blind drain where any spilled material could be pumped and returned to a sound container. All the drums were properly labeled and dated.

A problem that was noted during the inspection was the washing of contaminated equipment. Contaminated 2,4-D process equipment was being washed on a pad outside the hazardous waste storage building. The problem that was occurring was that not all of the wash water was being contained on the pad but was running off into a gravel area. This was brought to the attention of the company and they will make sure that this type of activity is conducted in an area where all water will be contained and drained to the process waste water system.

File - Rhone Poulenc, Inc.
July 26, 1985
Page 4

After the inspection was completed, it was requested that Rhone Poulenc submit their Contingency Plan and Personnel Training Plan. The Contingency Plan was reviewed and found to be in compliance with the Department's regulations. The Plan was found to be up-to-date and included current phone numbers and addresses of plant personnel.

The Personnel Training Program was reviewed. It is outlined in a document entitled, "RCRA Training." This training program meets the requirements of Department regulations. Training of all personnel is conducted on an annual basis.

The company's recordkeeping and reporting was reviewed during and after the inspection. It was found that the company keeps the proper records and has submitted the required quarterly reports in a timely manner.

The following is the summary of the violations noted during the inspection:

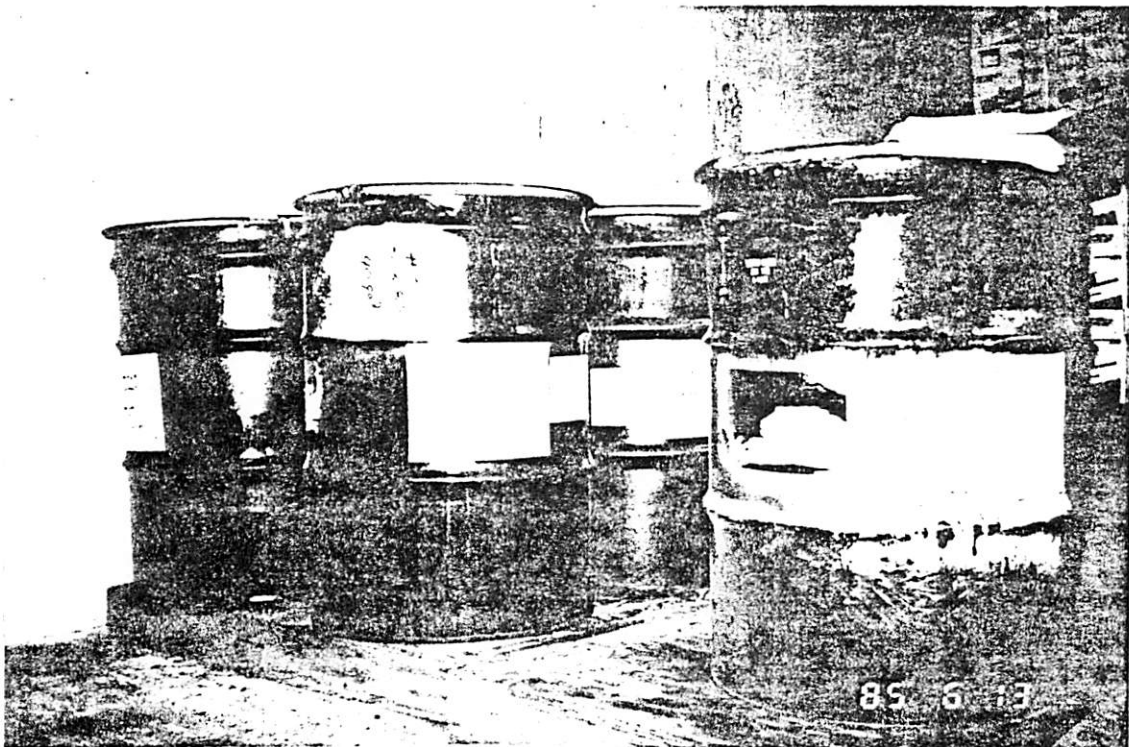
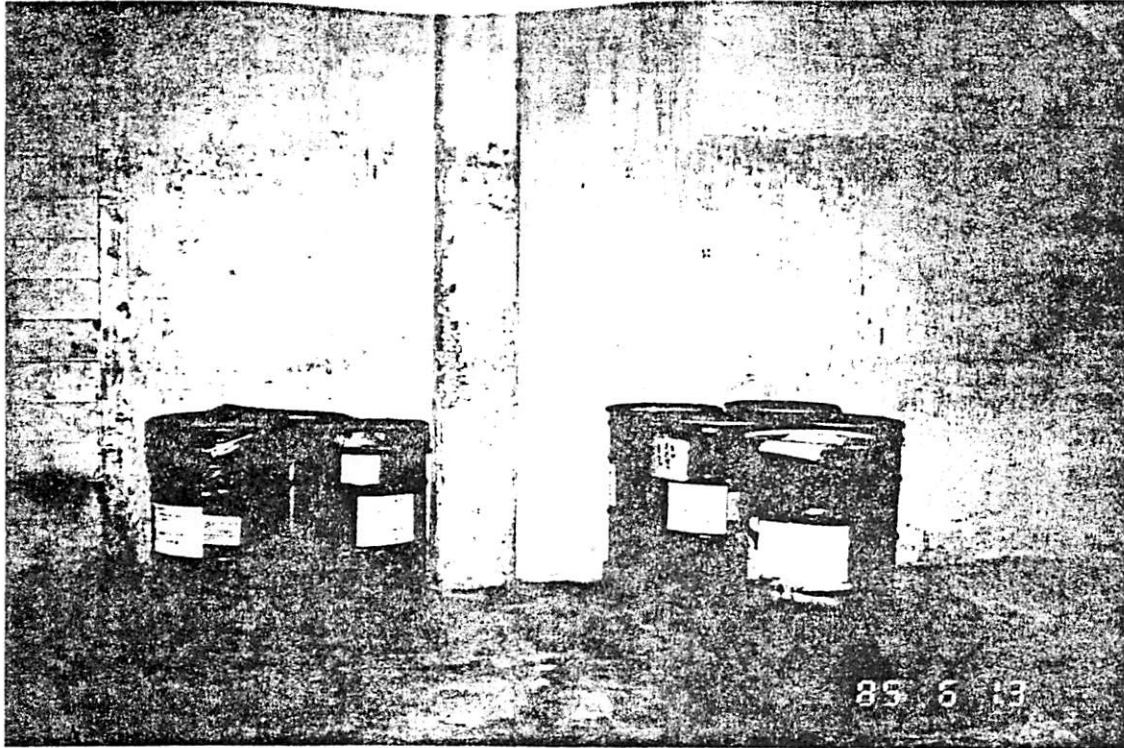
1. Improper U.S. Department of Transportation description on spent carbon manifests which is a violation of Oregon Administrative Rule (OAR) 340-102-020(1) Appendix I.
2. No label on the spent carbon tank as is required by OAR Chapter 340-102-034(1) (d).
3. Waste water from washing chlorinated herbicide contaminated process equipment running off the pad and draining onto the ground. This is, by definition, disposal without a permit which is a violation of OAR 340-105-001(2) since Rhone Poulenc does not have a TSD permit.

The facility was found to generally be complying with the Department's hazardous waste regulations. The three minor violations noted above need to be corrected. It is recommended that a Notice of Violation be sent to the company to do this.

CRC:d
RD2045
cc:

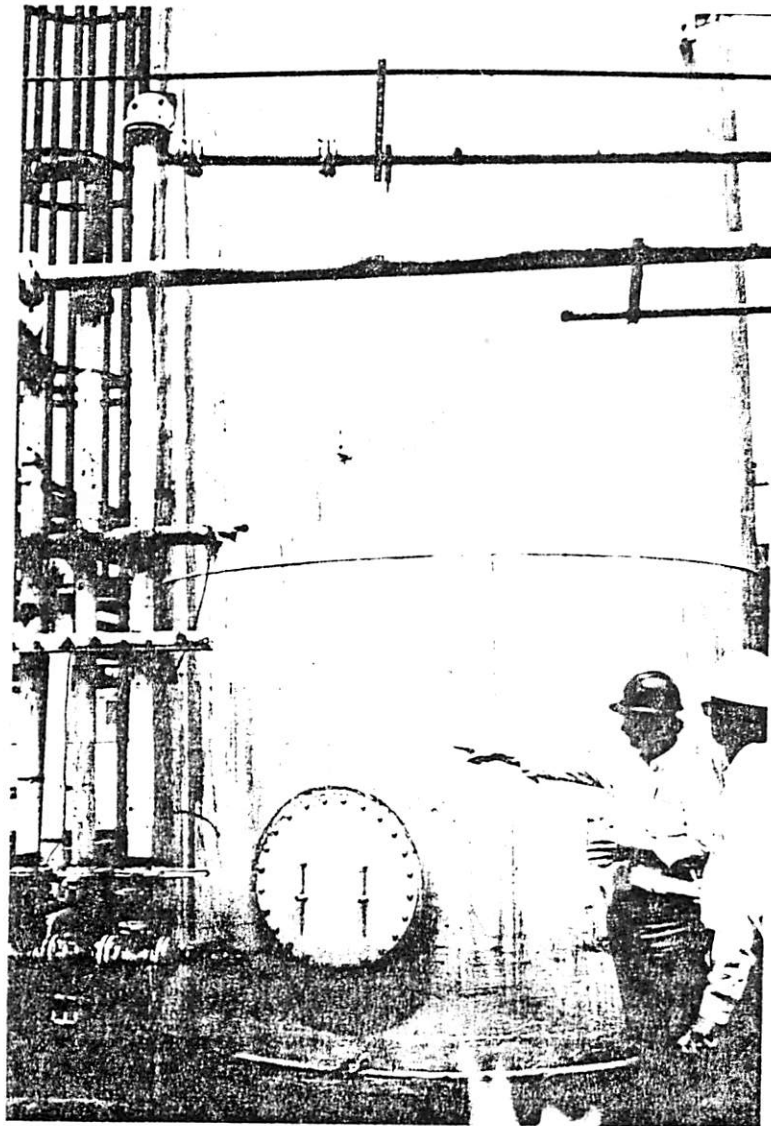
Hazardous and Solid Waste Division, DEQ

8-2-30
K. H. ... Inc
W. ... Area



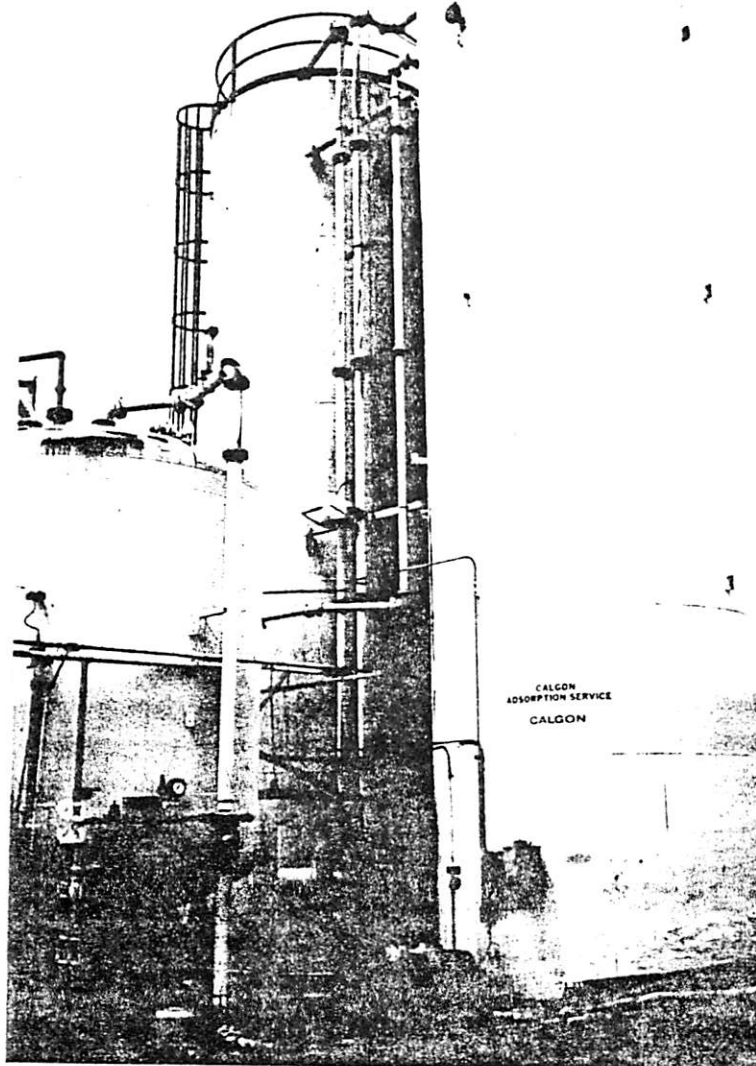
Rhone Poulenc, Inc.

Spent Carbon Tank



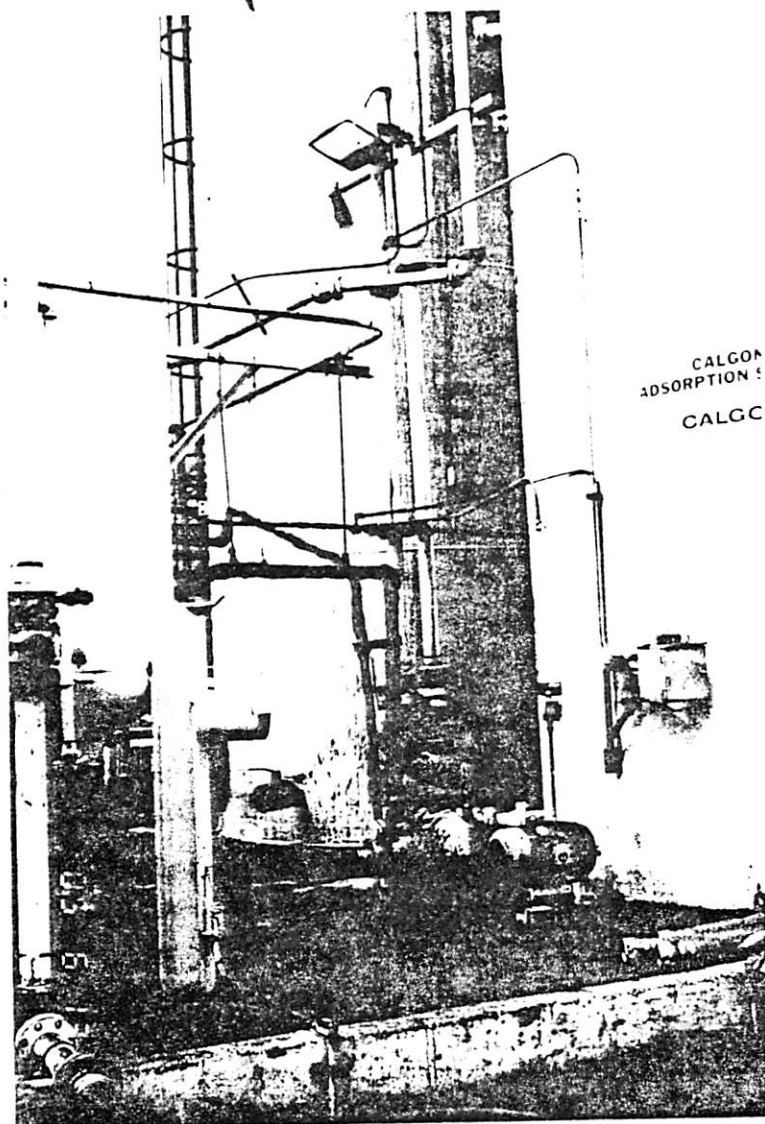
Rhone Poulenc, Inc.

Spent Carbon Tank



Rhone Poulenc, Inc.

Spent Carbon Tank



DEPARTMENT OF ENVIRONMENTAL QUALITY

Hazardous Waste Management
Inspection Checklist

PURPOSE -- This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to Oregon Revised Statutes (ORS) 459.410 to 459.690 for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information.
- II. Small Quantity Generator (SQG) Regulations (OAR 340-101-005)
- III. Generator Regulations (OAR 340 Division 102)
- IV. Treatment, Storage and Disposal (TSD) Permit Status Regulations (OAR 340 Division 104)

I. General Information

A. Inspection Type of inspection: Evaluation (X); Sampling (); Record Review (); Special (); Follow-up ()
Date/time inspection commenced: 6/13/85 1:40 pm.

B. Facility
EPA/State ID ORD 990659492
Name & Addresses Rhone - Poulenc, Inc.
1. Mailing Agricultural Division
2. Location 6200 N.W. St. Helens Road
Portland, Oregon 97210

Contact Robert Ferguson & Don Meyer
Telephone (503) 222-3571

C. Inspector
Name (Print) Charles R. Clinton Title Regional Supervisor
Region Northwest Phone 229-6955

D. Inspection Participants

<u>Name</u>	<u>Title</u>	<u>Phone</u>
<u>Michael J. Downs,</u>	<u>Admin. HW & SW Div</u>	<u>229-5356</u>
<u>Peter K. Ressler,</u>	<u>Environmental Analyst</u>	<u>229-5295</u>

E. Compliance Summary

3 No violations noted
Out of compliance

1. Areas of hazardous waste non-compliance requiring correction:

1. Improper DOT designation on manifests
2. No label on spent carbon tank
3. Waste water running off containment area

2. Expected corrective action for areas of non-compliance items (including time schedule as appropriate):

1. Use correct DOT designation - immediately
2. Put ~~the~~ Hazardous waste label on spent carbon tank - 60 days
3. Wash equipment in different area - immediately

3. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

YES

☒ NO

4. Other areas of non-compliance requiring followup via other DEQ programs:

Charles K. Clinton
DEQ Inspector

August 5, 1985
Date

Generator Representative

Date

F. Notification/Permit Information

1. Started operation: as Chipman Chemical Date: 1943
2. Notification filed: YES NO Date: 8-12-80
3. Part A application filed: YES NO Date: 11-19-80
4. Part B called/date due: YES NO Date: _____
5. Part B application: YES NO Date: _____
6. Changes in Notification or Part A: Part A Withdrawn Notification
Refilled 2-11-83 & 2-24-83
7. Facility is classified as:

Generator	<input checked="" type="checkbox"/>
Transporter	<input type="checkbox"/>
Treatment facility	<input type="checkbox"/>
Storage facility	<input type="checkbox"/>
Disposal facility	<input type="checkbox"/>
Small quantity generator	<input type="checkbox"/>
Recycler	<input type="checkbox"/>
Less than 90-day storage	<input type="checkbox"/>
Wastewater treatment unit exemption (WWTN)	<input checked="" type="checkbox"/>
Elementary neutralization unit exemption (ENU)	<input type="checkbox"/>

8. Does facility have a Part A withdrawal request in? YES NO

Status: Terminated by EPA

Comments: on 7-28-83

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- | | | |
|---------------------------------------|------------|-----------|
| (1) Ignitability (D001) [340-101-021] | <u>YES</u> | <u>NO</u> |
| (2) Corrosivity (D002) [340-101-022] | YES | <u>NO</u> |
| (3) Reactivity (D003) [340-101-023] | YES | <u>NO</u> |
| (4) EP Toxicity [340-101-024] | YES | <u>NO</u> |

List: D006 / X001 (2,4-D) (Bromoxynil octanoate)

b. Listed HW?

(1) HW from non-specific sources (FXXX) [340-101-031]
No

(2) HW from specific sources (KXXX) [340-101-032]
No

c. Discarded commercial chemical product (PXXX or UXXX)

No

(1) PXXX [340-101-033(6)] _____
(2) UXXX [340-101-033(7)] _____

d. Process manufacturing residue YES NO
($\geq 3\%$ of a P listed waste; $\geq 10\%$ of a
U listed waste) [340-101-033(3)(a)]

e. Pesticide or pesticide manufacturing residue [340-101-034] YES NO

f. Pesticide residue or empty containers produced by the use of pesticides YES NO
[340-109-020]

g. Has facility petitioned to delist waste? [340-101-022] YES NO
Date: _____ Comments: _____

h. Does facility qualify for WWTU or YES NO
ENU? [340-101-003(2)(d)]
Comments: _____

i. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? [340-102-011] YES NO

(1) What are the wastes generated? See individual
sheets (attached)

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in OAR 340 Division 101)?

Comments: Lab analyses & knowledge
of processes and waste streams

(3) Are records available on the determination(s)? [340-102-040(3)] YES NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/Part A application? YES NO

If not, explain:

2. Specific information: Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW and attach.)

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

→ See Attached waste profile sheets

Facility Name Rhone Poulenc
EPA/State ID ORD 990654492

III. Generator Regulations OAR 340 Division 102

- A. Is the facility or does facility claim to be a small quantity generator (under 340-101-005)?

YES

☒ NO

Comments: _____

- B. Does generator transport its own waste?

YES

☒ NO

If NO, what is transporter's EPA ID, name, address and phone

EPA ID ORD 089452353

Name Chem - Security Systems, Inc.

Address Star Route

Arlington, Oregon 97812

Telephone (503)-454-2643

- C. Does generator use the manifest system? [340-102-020]

☒ YES

NO

Does generator substitute shipping papers for the manifest for wastes shipped off-site for beneficial use or reuse? [340-102-020(5)]

YES

☒ NO

1. Does the generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? [340-102-020(2)]

YES

☒ NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest. [340-102-020(1)]

OK

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste. [340-102-020(4)]

OK

Does the manifest contain the following information: [340-102-021(1)]

- a. Manifest document number [340-102-021(1)(a)] YES NO
- b. Generator's name, mailing address, phone number and EPA ID number [340-102-021(1)(b)] YES NO
- c. Name and ID number of each transporter [340-102-021(1)(c)] YES NO
- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any [340-102-021(1)(d)] YES NO
*No alternate
Return to generator*
- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203 [340-102-021(1)(e)] YES NO
- Proper shipping name YES NO
- Hazard class YES NO
- Identification number YES NO
- f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle [340-102-021(1)(f)] YES NO
4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and DEQ regulations? [340-102-021(2)] YES NO
5. Does the manifest contain an adequate number of copies to provide one copy for: [340-102-022]
- a. Generator's records YES NO
- b. Records of each transporter YES NO
- c. TSD facility owner or operator's records YES NO
- d. Signature by each transporter and return to generator YES NO
- e. Signature by TSD facility and return to generator YES NO
6. Does the generator use the manifest properly by: [340-102-023(1)]
- a. Signing the certification [340-102-023(1)(a)] YES NO

- b. Obtaining signature and date of acceptance from initial transporter [340-102-023(1)(b)] YES NO
- c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility [340-102-023(1)(c)] YES NO
- d. Giving transporter the remaining copies of the manifest [340-102-023(2)] YES NO
7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? [340-102-042(1)] YES NO
8. Does the generator submit an Exception Report to the DEQ in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? [340-102-042(2)] YES NO
But has not occurred during the last year
9. If a Manifest Exception Report was submitted, did it include the following: [340-102-042(2)]
- a. A legible copy of the manifest, and [340-102-042(2)(a)] YES NO
- b. A letter of explanation describing efforts and results of status investigation [340-102-042(2)(a)] YES NO

* * * * * TSD FACILITIES SKIP TO MODULE IV * * *

- D. Does generator operate a specific area on-site for container handling or storage? YES NO
1. Does generator comply with the requirements set forth in governing on-site waste accumulation? [340-102-034(1)(a)] YES NO
- a. Labeled and marked with words "Hazardous Waste" [340-102-034(1)(d)] YES NO
- b. Date period of accumulation begins [340-102-034(1)(c)] YES NO
- c. Inspections (weekly for containers) [340-104-174] YES NO
2. Are incompatible wastes segregated? YES NO
3. What quantities of HW are stored? 9 Barrels

4. What is the longest period that it has been stored? Since 9/4/85
5. Were there any hazardous wastes stored on-site at the time of inspection? (90-day storage allowance is allowed only if the waste is stored in accordance with OAR 340-102-034; i.e., must be stored in containers or tanks. Thus, need to make note if storing in waste pile, etc.) ☒ YES ☐ NO
- a. If YES, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? [340-102-034(a) or (b)] ☒ YES ☐ NO
- b. If not properly packaged or in secure tanks, please explain.
- _____
- _____
- _____
- c. Are containers clearly marked and labeled? [340-102-034(1)(d)] ☒ YES ☐ NO
- d. Do any containers appear to be leaking? YES ☒ NO
[340-104-174]
- e. If YES, how many? _____
6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met. [340-102-034(1)]
- a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? [340-104-172] ☒ YES ☐ NO
- b. Are the containers always closed, except to add or remove waste? [340-104-173(1)] ☒ YES ☐ NO
- c. Are container storage areas inspected weekly for leaks and container deterioration? [340-104-174] ☒ YES ☐ NO

d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? ☒ YES ☐ NO
[340-104-017(1)]

e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? ☒ YES ☐ NO
[340-104-176]

f. Is the facility aware of and complying with the following requirements for incompatible wastes:

(1) Incompatible wastes must not be placed in the same container, unless in compliance with OAR 340-104-017(2). ☒ YES ☐ NO
[340-104-177(1)]

(2) HW must not be placed in an unwashed container that previously held an incompatible waste. ☒ YES ☐ NO
[340-104-177(2)]

(3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall or other device? YES ☒ NO
[340-104-177(3)]
Explain:

Seperation distance
adequate

g. Before transport, are containers marked or labeled in a manner equivalent to 49 CFR 172? ☒ YES ☐ NO
[340-102-031 and 340-102-032]

h. Is secondary containment provided for storage of more than 100 drums (required after January 1, 1985)? YES ☐ NO ☒
[340-102-034(1)(f)]

Not applicable

i. Comments: Drainage to containment
sump

7. a. Does the generator import or export HW? YES
[340-102-050]

NO

b. If YES, has notification of this activity been submitted to the Department and the EPA Regional Administrator? [340-102-050(2)(a)]

YES

NO

c. Is a copy of that notification available? (If YES, obtain copy.)

YES

NO

d. If a copy is not available, or cannot be obtained, determine: (1) when the notification was submitted; (2) for what waste type; and (3) for what foreign facility (name and address).

YES

NO

NA

8. Preparedness and Prevention (OAR 340-104 Subdivision C)
[340-102-034(1)(c)]

a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? [340-104-031]

YES

NO

sprinkler system

b. Is internal emergency communication equipment or alarm systems installed? What type? [340-104-032(1)]

YES

NO

Bromine alarm & Buzzer alarm

c. Is a device (e.g., telephone) immediately available for summoning emergency assistance? [340-104-032(2)]

YES

NO

d. Are fire extinguishers or other emergency equipment immediately available on-site? [340-104-032(3)]

YES

NO

e. Is emergency communications and response equipment tested? How often? [340-104-033]

YES

NO

once a week

f. Is aisle space adequate for emergency response? What is aisle spacing? [340-104-035]

YES

NO

26 inches

g. (1) Have any arrangements been made with local emergency response organizations? [340-104-037(1)]

YES

NO

(2) Which organizations?

City of Portland Police
" " " Fire Dept

Emmanuel Hospital
Physicians & Surgeon
Hospital

(3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?
[340-104-037(2)]

YES

NO

N/A

9. Contingency Plan/Emergency Procedures (OAR 340-104 Subdivision D) [340-102-034(1)(e)]

a. Has contingency plan been developed?
(It may be a modified SPCC plan.)
[340-104-051(1)]

YES

NO

b. Have incidents occurred where the plan has been implemented?

YES

NO

c. Have incidents occurred where the plan should have been implemented but was not? [340-104-051(2)] Explain:

YES

NO

d. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

(1) Does the plan describe actions to be taken by personnel in response to fire, explosion or releases to the environment? [340-104-052(1)]

YES

NO

(2) Does the plan describe arrangements made with external emergency response organizations?
[340-104-052(3)]

YES

NO

(3) Does the plan list those qualified to act as emergency coordinator including their name, address and phone? [340-104-052(4)]
Is the plan current?

YES

NO

(4) Is all emergency equipment available at the facility listed in the plan?
[340-104-052(4) and 340-104-054]

YES

NO

YES

NO

(a) Is the location and a description of the equipment included?
[340-104-052(5)]

YES

NO

(b) Are capabilities described for each piece or equipment unit? ☒ YES ☐ NO
[340-104-052(5)]

(5) Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternate routes)? ☒ YES ☐ NO
[340-104-052(6)]

(6) Is a copy of the plan maintained at the active facility (vs. main office)? ☒ YES ☐ NO
[340-104-053(1)]

(a) Has a copy been supplied to appropriate off-site emergency response organizations? Which? ☒ YES ☐ NO
[340-104-053(2)]

(7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? ☒ YES ☐ NO
[340-104-055]

How are they available? [340-104-055]

Are there limits of this person's authority to respond to emergencies (i.e., resource commitments)? ☒ YES ☐ NO
[340-104-055]

(8) Has an emergency occurred? ☐ YES ☒ NO

Was the plan implemented? ☐ YES ☐ NO

(If YES, describe incident and attach if not already reported).

10. Personnel Training (OAR 304-104-016)
[340-102-034(1)(e)]

a. Has a training program been developed? ☒ YES ☐ NO
What type? (Classroom? On-the-job?)
[340-104-016(1)(a)] *Both*

b. Does the program include contingency plan and response training? ☒ YES ☐ NO
[340-104-016(1)(b)]

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures and systems, including: [340-104-016(1)(c)] *yes*

- (1) Procedures for using and maintaining equipment? YES NO
[340-104-016(1)(c)(A)]
- (2) Key parameters for automatic waste feed cut-off? YES N/A NO
[340-104-016(1)(c)(B)]
- (3) Communications or alarm equipment? YES NO
[340-104-016(1)(c)(C)]
- (4) Response to fire and explosion? YES NO
[340-104-016(1)(c)(D)]
- (5) Response to groundwater contamination incidents? YES NO
[340-104-016(1)(c)(E)]
- (6) Facility shut-down? YES NO
[340-104-016(1)(c)(F)]
- d. Are records available at the facility for the following: [340-104-016(4)]
- (1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO
[340-104-016(4)(a)]
- (2) Written job description for each job title? YES NO
[340-104-016(4)(b)]
- (a) Does the job description include the skill, education or qualifications required for the position? YES NO
[340-104-016(4)(b)]
- (b) The duties assigned to that position? YES NO
[340-104-016(4)(b)]
- (3) A written description of the type and amount of training to be given to those in each job position? YES NO
[340-104-016(4)(c)]
- (4) A record of training completed or experience obtained for each job position by employee? YES NO
[340-104-016(4)(d)]
- (5) Was the required training obtained within 6 months of employment by each individual involved in hazardous waste management activities? YES NO
[340-104-016(2)]

E. Is generator familiar with Generator Reporting Procedures?

- | | | | |
|----|--|-----|----|
| 1. | Quarterly reports [340-102-041] | YES | NO |
| a. | For wastes shipped in-state | YES | NO |
| b. | For wastes shipped out-of-state | YES | NO |
| c. | For wastes shipped for beneficial use or recycling | YES | NO |
| 2. | Exception reports [340-102-042] | YES | NO |
| 3. | Spills and discharges to the environment [340-108-020] | YES | NO |
| 4. | Comments: | | |

F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport?

- | | | | |
|----|---|-----|----|
| 1. | Packaging 49 CFR 173, 178, 179 and with requirements of state [340-102-030] | YES | NO |
| 2. | Labeling 49 CFR 172 [340-102-031] | YES | NO |
| 3. | Marking 49 CFR 172 [340-102-032] | YES | NO |
| 4. | Placarding 49 CFR 172 Subpart F [340-102-033] | YES | NO |
| 5. | Containers of hazardous waste must be marked with the following, or essentially equivalent, words and information displayed in accordance with 49 CFR 172.304 [340-102-032(1)]: | | |

HAZARDOUS WASTE -- Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's name and address _____
Manifest document no. _____
[340-102-032(2)]

6. Comments:

G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed or recovered? YES NO

If YES, what are they Spent carbon

- | | | |
|----|-------------------|--------------------|
| 1. | Sludge | |
| 2. | Characteristic HW | Pesticide X001 (X) |
| 3. | Listed HW | (X) |
| 4. | Comments: | |

Waste No. X001

1. Waste name: Lab waste
2. Hazard classification: Toxic
3. Process producing waste: Environmental + quality control sampling
4. Rate of waste production: 4 drums per year
5. Waste handling prior to disposal: stored in drums, labeled + store on site for under 90 days
6. Waste disposal practice and manifest: Transported by CSSI to Arlington for disposal
7. Reporting and recordkeeping: Manifested, records maintained and quarterly reports submitted.

HAZARDOUS WASTE GENERATION AND MANAGEMENT

Waste No. : D001

1. Waste name: Lab wastes
2. Hazard classification: ~~Lab waste~~ Igniteable
3. Process producing waste: Analyzing & Sampling for environmental and quality control.
4. Rate of waste production: 2 barrels per year
5. Waste handling prior to disposal: stored in drums, labeled & store on site for under 90 days
6. Waste disposal practice and manifest: Transported by CSSI to Arlington for disposal
7. Reporting and recordkeeping: Manifested, records maintained and quarterly reports submitted.

HAZARDOUS WASTE GENERATION AND MANAGEMENT

Waste No. X001

1. Waste name: Carbon - ~~from~~ "spills"
2. Hazard classification: Toxic
3. Process producing waste: spills of pesticide material
4. Rate of waste production: \approx 2000 pounds/yr
5. Waste handling prior to disposal:
Stored in drums, labeled & stored
for under 90 Days on site
6. Waste disposal practice and manifest:
Transported by CSSI to
Arlington for Disposal
7. Reporting and recordkeeping:
Manifested, Quarterly reported &
Records maintained

Waste No. X001

1. Waste name: Contaminated equipment
2. Hazard classification: Toxic
3. Process producing waste: Removal of ^{process} equipment from plant.
4. Rate of waste production: less than 100 ~~bar~~ drums per year
5. Waste handling prior to disposal: Stored in drums or if material is too long for drum it is wrapped in plastic. The waste is labeled and stored on site for less than 90 days
6. Waste disposal practice and manifest:
Transported ~~by~~ CSSI to Arlington for disposal.
7. Reporting and recordkeeping: Manifested, records maintained & Quarterly reports submitted

HAZARDOUS WASTE GENERATION AND MANAGEMENT

Waste No. X001

1. Waste name: Bromoxynil octanoate filter waste
2. Hazard classification: Toxic
3. Process producing waste: Filtration of Bromoxynil octanoate by diatomaceous earth to remove impurities
4. Rate of waste production: ¹²~~4 to 5~~ drums per year
5. Waste handling prior to disposal: stored in drums, labeled & stored on site for less than 90 days
6. Waste disposal practice and manifest: Transported ^{by CSSI} to Arlington for disposal.
7. Reporting and recordkeeping: Manifested, Quarterly reported & records maintained

Waste No. X001

1. Waste name: Bromoxynil octanoate pit sludge
2. Hazard classification: Toxic
3. Process producing waste: Floor wash down water drains to a pit
4. Rate of waste production: 4 to 5 drums per year
5. Waste handling prior to disposal: Stored in drums, labeled and stored on site for less than 90 days.
6. Waste disposal practice and manifest: Transported by CSSI to Arlington for Disposal
7. Reporting and recordkeeping: Manifested, records maintained and Quarterly reports submitted

Waste No. D016

1. Waste name: ~~D016~~ spent carbon
2. Hazard classification: I
3. Process producing waste: waste water treatment system and rain water and groundwater treatment system
4. Rate of waste production: 300,000 pounds per year
5. Waste handling prior to disposal: stored in 20,000 gal tank
6. Waste disposal practice and manifest: Transported by Ealgon Corp. to ^{their facilities} Pennsylvania or Kentucky. The carbon is regenerator and reused. A uniform manifest is used
7. Reporting and recordkeeping:
Records are kept and quarterly reports submitted.

- neutralization of ~~corrosive~~ corrosive wastes? elementary neutralization?
- commercial chemical products? see above
- disposal? chem-securities
- state permits? sewer discharge; NPDES
- length of storage? waste pile - empty bags from D002? ^{possibly also from acute wastes A} also misc. contaminated wood
rest of storage: usually < 90 days; ^{NO 90 day allowance} always < 6 months.
- surface impoundment receiving hwy. waste? NO
- handling "on-site" wastes only? yes

Need to follow-up on "occasional chemical treatment"
possible elementary neutralization unit
clarification + listing on Part A of what is
stored in waste pile; currently only list D002

AD

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Rhone Poulenc Chemical Co
Portland

telecon: 12/30/80
Robert Briggs
503-222-3571

Info from Part A:

design capacity:

501	350	U	
502	385,000	G	
503	400	Y	waste pile
TD1	13,000	G	→ neutralization w/ lime
TD4	288,000	U	→ activated carbon treatment system for wastewater

→ says they are not treating any of the below-listed wastes with this system.

estimated annual quantity:

chem security
EST - Idaho

2,6-Dichlorophenol
from 2,4-D production

K043

FOO2

600,000 P 501, 502

in above

D001

in above

D001

10,000 P 501

D001

U140

not CCP's

4,500 P 501

U081

in above

U188

10,000 P 501, 502

From spills of phenol;
also phenol-contaminated material

2,4-D

~~FOO2~~

D002, D016

160,000 P ~~TD4~~ 501, 502

→ This listing represents carbon which has 2,4-D adsorbed onto it; they do not treat the carbon (thus remove TD4)

D ~~FOO2~~

D002

120,000 P 501, 502, 503, ~~TD4~~ TD1

misc. corrosive wastes; neutralization + possibly chemical destruction on occasion; "chemical destruction" not indicated above under design capacity

K043

96,000 P 502

≤ 90 days

110,000

sludge from using alcohol to clean 2,4-D tanks mostly alcohol

Handwritten notes at the top of the page, including the word "Handwritten" and some illegible scribbles.

Handwritten notes in the upper middle section, including the word "Handwritten" and some illegible scribbles.

Handwritten notes in the lower middle section, including the word "Handwritten" and some illegible scribbles.

Handwritten notes at the bottom of the page, including the word "Handwritten" and some illegible scribbles.

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			S O R D 9 9 0 6 5 9 4 9 2											

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
	80/11/19	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)	
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)			FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
71		71	
C	YR. MO. DAY	C	YR. MO. DAY
8	4 3 07 01		
73 74 75 76 77 78		73 74 75 76 77 78	

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

Exact date not known

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS ☐ 2. FACILITY HAS A RCRA PERMIT

72 72

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C T/A C I																									
D U P																									
13 14 15																									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)					2. UNIT OF MEA- SURE (enter code)								1. AMOUNT					2. UNIT OF MEA- SURE (enter code)					
X-1	S 0 2	600					G						5	T 0 4	288,000					U					
X-2	T 0 3	20					E						6												
1	S 0 1	350					U						7												
2	S 0 2	385,000					G						8												
3	S 0 3	400					Y						9												
4	T 0 1	13,000					G						10												

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

T-004 Activated carbon treatment system for waste water.
Line 3 Design capacity 200 GPM capacity covered by an NPDES permit.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA Form 3510-3 (6-80)

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 1

EPA I.D. NO. (enter from page 1)

5	F	0	R	D	9	9	0	6	5	9	4	9	2	T/A	C
1	2													6	

V. FACILITY DRAWING

A. Existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4 5 3 3 5 9

LONGITUDE (degrees, minutes, & seconds)

1 2 2 4 4 5 1

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

Rhône Poulenc Inc.

2. PHONE NO. (area code & no.)

2 1 2 - 8 8 3 - 1 2 6 0

3. STREET OR P.O. BOX

52 Vanderbilt St.

4. CITY OR TOWN

New York

5. ST.

NY

6. ZIP CODE

1 0 0 1 7

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

VINCENT E. DE FELICE

B. SIGNATURE

Vincent E. De Felice

C. DATE SIGNED

Nov. 19, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

R. F. GITSCHLOB

B. SIGNATURE

R. F. Gitschlob

C. DATE SIGNED

11/19/1980

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	I. EPA I.D. NUMBER <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">6</td> <td style="width:5%;">F</td> <td style="width:5%;">O</td> <td style="width:5%;">R</td> <td style="width:5%;">D</td> <td style="width:5%;">9</td> <td style="width:5%;">9</td> <td style="width:5%;">0</td> <td style="width:5%;">6</td> <td style="width:5%;">5</td> <td style="width:5%;">9</td> <td style="width:5%;">4</td> <td style="width:5%;">9</td> <td style="width:5%;">2</td> <td style="width:5%;">T/A</td> <td style="width:5%;">C</td> </tr> <tr> <td>1</td> <td>2</td> <td>3</td> <td>4</td> <td>5</td> <td>6</td> <td>7</td> <td>8</td> <td>9</td> <td>10</td> <td>11</td> <td>12</td> <td>13</td> <td>14</td> <td>15</td> <td>16</td> </tr> </table>	6	F	O	R	D	9	9	0	6	5	9	4	9	2	T/A	C	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
6	F	O	R	D	9	9	0	6	5	9	4	9	2	T/A	C																				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16																				
LABEL ITEMS I. EPA I.D. NUMBER III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE	GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.																																

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	RHONE POULENC CHEMICAL CO. AGROCHEM. DIV.
---	------	---

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	R. ROBERT BRIGGS	5.0.3	2.2.2 3.5.7.1

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN	C. STATE	D. ZIP CODE
3	PO BOX 10224	P. O. R. T. L. A. N. D.	O R	9 7 2 1 0

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	6.2.0.0 NW ST. HELENS RD	M. U. L. T. N. O. M. A. H.	O R	9 7 2 1 0	0.5.1		

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7 2 8 6 9 (specify) Organic Chemicals Nec										7 (specify)									
C. THIRD										D. FOURTH									
7 2 8 7 9 (specify) Pesticides & Ag. Chemicals										7 (specify)									

VIII. OPERATOR INFORMATION

A. NAME																																																		B. Is the name listed in Item VIII-A also the owner?									
R H O N E P O U L E N C C H E M I C A L C O .																																																		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)									
F = FEDERAL M = PUBLIC (other than federal or state) P = PRIVATE S = STATE O = OTHER (specify) <u>P</u> (specify)																														2 1 2 8 8 3 1 2 6 0									

E. STREET OR P.O. BOX																																																	
6 2 0 0 N W S T . H E L E N S R D .																																																	

F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND									
P O R T L A N D																				O R					9 7 2 1 0					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
9 N 0 R - 0 0 0 1 7 4 - 1															9 P 2 6 2 4 0 3														
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
9 U															(specify)														
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
9 R 0 R D 9 9 0 6 5 9 4 9 2															9 1 4 3 4 0 3 (specify) City of Portland or Ordinance No.														

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

A Manufacture of organic chemicals and pesticides i.e. herbicides from basic raw materials, formulation of these herbicides into saleable product, shipment of intermediate chemicals, technical herbicide and formulations.																																																	
---	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

XIII. CERTIFICATION (see instructions)

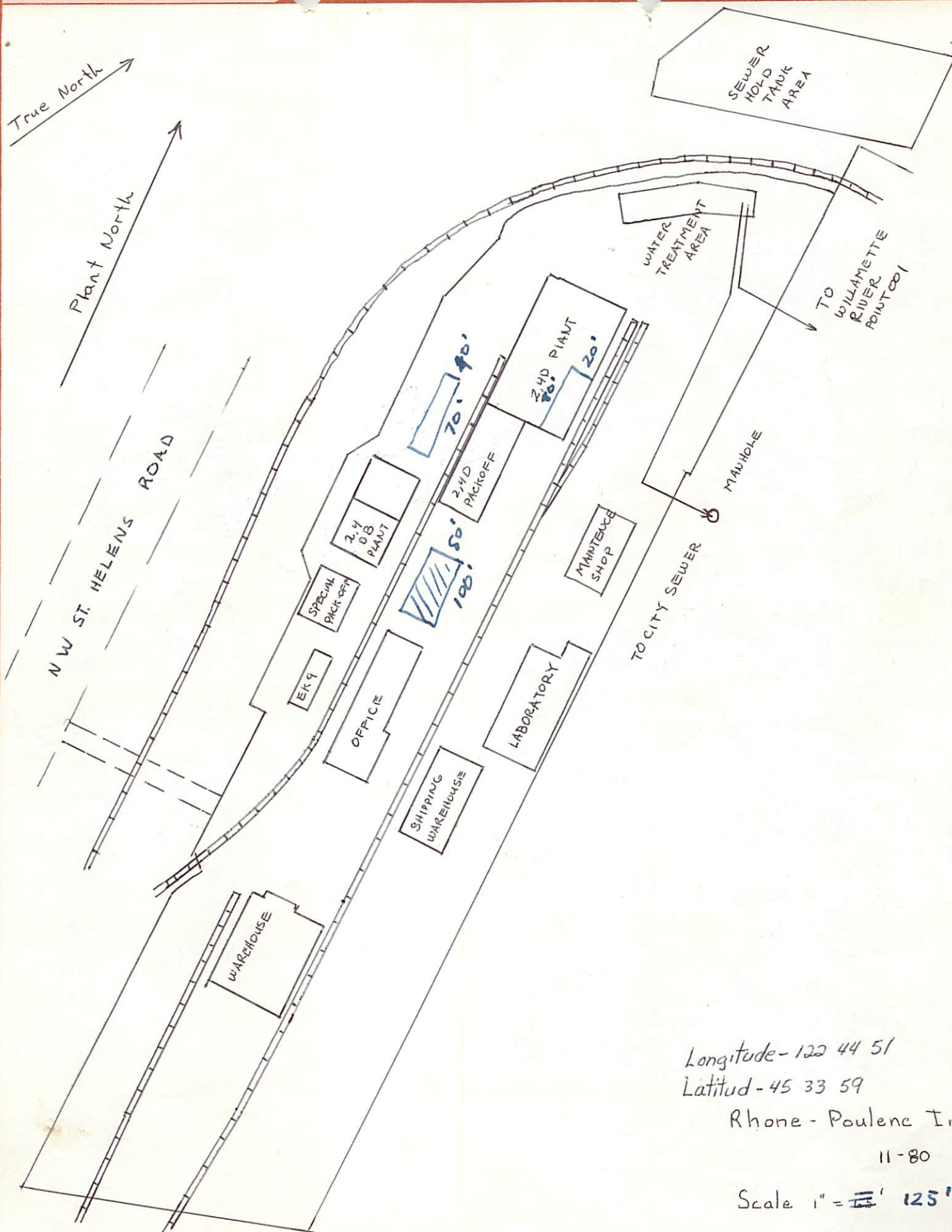
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)																				B. SIGNATURE																				C. DATE SIGNED									
VINCENT E D'FELICE Vice President																				<i>Vincent E D'Felice</i>																				Nov. 19, 1980									

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

V. FACILITY DRAWING (see page 4)



RCRA HAZARDOUS WASTE FACILITY

Rhone Poulenc
ORD 990659492

Submitted public participation documents for review to:

Salem Public Library
Beaverton Central Library
DEQ - Willamette Valley Regional
OOO - c/o Al Goodman
EPA Info Center

Submitted 30-second announcement for broadcasting to:

KEX
KSLM

Submitted public notice for publishing to:

Oregonian
Oregon Statesman

Submitted public notice for posting to:

Mailed public notice/public participation package to:

Oregon Environmental
mailing list as of 8/9/83

N/S 533

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

AUG 10 1983

Mr. Robert L. Ferguson
Plant Manager
Rhone-Poulenc, Inc.
P. O. Box 10224
Portland, Oregon 97210

Re: Tentative Decision on Termination of Interim Status and Final
Administrative Disposition of the RCRA Permit for
Rhone-Poulenc, Inc. - EPA Identification No. ORD990659492

Dear Mr. Ferguson:

This letter is to acknowledge your request to withdraw your Resource Conservation and Recovery Act (RCRA) permit application and terminate interim status at the above facility. EPA has tentatively decided to proceed as you requested. The basis for this action is covered in the attached Statement of Basis.

This action constitutes final administrative disposition of your RCRA permit; therefore, EPA must follow the public participation requirements of 40 CFR Part 124. A public notice is tentatively scheduled to be issued on AUG 12 1983. A copy of the public notice to terminate interim status and deny the RCRA permit is enclosed for your information. The comment period on this public notice will be open for 45 days. If EPA receives written opposition to this action at your facility, and written request for a public hearing, a hearing will be scheduled. You will be notified, in the event of a public hearing.

Once this action becomes final, Rhone-Poulenc, Inc. will only be required to comply with the State of Oregon regulations for onsite accumulation of hazardous waste. Since Oregon has received RCRA Phase I Interim Authorization, the Federal regulations for generators do not apply to your facility. However, the State regulations should be substantially equivalent to EPA regulations governing accumulation for less than 90 days as specified in 40 CFR 262.34(a).

-2-

Please contact Ms. Carrie Adams, of EPA's RCRA Compliance and Permits Section, at (206) 442-2806, if you have any questions regarding this matter.

Sincerely,

Alexandra B. Smith, Director
Air & Waste Management Division

Enclosures

cc: Richard Reiter, Oregon Department of Environmental Quality, Portland

bcc: Judy Fey

cle 8-6
WMB:CADams: 6-22-83

1506G

CONCURRENCES

SYMBOL	Hofer	Reigner	Findley	Moore				
SURNAME	<i>out</i>	<i>8/10/83</i>		<i>as</i>				
DATE				<i>8/10</i>				

U.S. Environmental Protection Agency
Region 10 - Seattle, Washington

STATEMENT OF BASIS

Proposed Action: Termination of Interim Status and Permit Denial under the Resource Conservation and Recovery Act (RCRA)

Facility Name: Rhone-Poulenc, Inc. - Agrochemical Division

EPA ID No.: ORD990659492

Facility Owner: Rhone-Poulenc, Inc.

Facility Address: 6200 N.W. St. Helens Road
Portland, Oregon

Basis for Proposed Action

Rhone-Poulenc, Inc. submitted a Part A RCRA permit application by November 19, 1980, and initially qualified for interim status under RCRA as a hazardous waste management facility storing spent solvents, wastes exhibiting the characteristic of ignitability, 2,6-Dichlorophenol waste from the production of 2,4-D, and spill residues containing phenol and phenol contaminated material in containers and tanks; and treating process waste water and surface waste water in tanks. By letter dated June 23, 1982, EPA requested Rhone-Poulenc, Inc. to submit a Part B application for a RCRA permit.

On December 10, 1982, Rhone-Poulenc, Inc. notified EPA, by letter, that a Part B application would not be submitted, because the facility would not need a RCRA permit as they had changed operations and begun shipping all hazardous wastes stored in containers and tanks to a hazardous waste disposal site within 90 days of the initial accumulation date of storage. Treatment processes at the facility were also claimed exempt from RCRA permit requirements under the "elementary neutralization" and "totally enclosed treatment facility" exemptions.

On June 14, 1983, EPA met with the company to discuss the December 10, 1982 request to withdraw the RCRA permit application, and to tour the facility. It was found at this meeting that the plant had ceased manufacturing 2,4-D, dichlorophenol and other pesticides/herbicides from which hazardous wastes had been generated. Instead these materials were being purchased as commercial chemical products and converted at the plant into other products to be sold by Rhone-Poulenc, Inc. In these conversion processes, however, hazardous wastes regulated by RCRA were still generated.

Process waste water was found to be pumped through activated carbon filtration units, to two successive tanks where neutralization occurred. After neutralization, the waste was pumped to holding tanks where analyses were performed prior to discharge, in accordance with pretreatment limits, to the publicly owned treatment works. The surface waste water was collected by a subsurface drainage collection system, run through filtration and neutralization tanks similar to those for process waste water, and then discharged in accordance with a National Pollutant Discharge Elimination System (NPDES) permit. These observations were recorded in an intra-agency memo dated June 17, 1983.

EPA, therefore, bases this tentative decision to deny the RCRA permit and terminate interim status on the company's written statement and observations made during the June 14, 1983 site visit. Under 40 CFR 270.1(c)(2)(i), generators who accumulate hazardous waste for less than 90 days in tanks and containers are excluded from the need to obtain a RCRA permit. Tanks which meet EPA's definition of "waste water treatment units" are also excluded from permit requirements by 40 CFR 270.1(c)(2)(v). This exclusion was found to be applicable to the tank treatment processes utilized at the Rhone-Poulenc, Inc. site during the June 14, 1983 site visit.

Rhone-Poulenc, Inc.'s documentation of their revised hazardous waste handling procedures will satisfy EPA closure requirements. Rhone-Poulenc, Inc. will continue to be regulated under the State of Oregon Department of Environmental Quality regulations for generators.

Comment Period

Begins: AUG 12 1983

Ends: SEP 26 1983

All persons, including the applicant, who wish to comment on the proposed action, must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by the end of the comment period. Comments should be sent to the U.S. Environmental Protection Agency, ATTENTION: Ms. Carrie Adams, 1200 Sixth Avenue, M/S 533, Seattle, Washington 98101.

Procedures for Requesting a Hearing

A public hearing will be held if EPA receives written notice of opposition to the proposed permit decision regarding this facility and a request for a hearing by the end of the comment period. Any request for a hearing shall be in writing and should state the nature of the issues proposed to be raised in the hearing. Requests for a hearing should be submitted to the U.S. Environmental Protection Agency, ATTENTION: Ms. Carrie Adams, 1200 Sixth Avenue, M/S 533, Seattle, Washington 98101.

Persons with questions may contact Carrie Adams of EPA's Regional Office in Seattle, Washington at (206) 442-2806, or Richard Reiter of the Oregon Department of Environmental Quality in Portland, Oregon at (503) 229-5913.

Concurrence:

Adams
9/9

Day

Hofen
out

Fargner
8/10/83

Findley

Smith

Moore
8/10

16606

M/S 533

AUG 11 1983

Beaverton Public Library
4550 S. W. Hall Boulevard
Beaverton, Oregon 97005

Re: Public Notice for Termination of Interim Status, Reliance Universal,
Incorporated, Rhone-Poulenc Chemical Company, Western Kraft Paper Group,
Mercer Industries, American Can Company

Dear Sir or Ms. Librarian:

Enclosed is a public participation package for proposed termination of
interim status for storage and treatment of hazardous wastes at the above
references facilities.

Please maintain this package for viewing by interested individuals for the
duration of the 45-day public comment period scheduled to commence on Friday,
August 12, 1983 and end Monday, September 26, 1983.

If you have any questions, please call me at (206) 442-2806. Thank you for
your assistance.

Sincerely,

Carrie Adams
RCRA Compliance & Permits Section

WMB:CAAdams:nay:8-11-83 (2559H)

M/S 533

AUG 11 1983

Salem Central Library
585 Liberty S. E.
Salem, Oregon

Re: Public Notice for Termination of Interim Status, Reliance Universal,
Incorporated, Rhone-Poulenc Chemical Company, Western Kraft Paper Group,
Mercer Industries, American Can Company

Dear Sir or Ms. Librarian:

Enclosed is a public participation package for proposed termination of
interim status for storage and treatment of hazardous wastes at the above
references facilities.

Please maintain this package for viewing by interested individuals for the
duration of the 45-day public comment period scheduled to commence on Friday,
August 12, 1983 and end Monday, September 26, 1983.

If you have any questions, please call me at (206) 442-2806. Thank you for
your assistance.

Sincerely,

Carrie Adams
RCRA Compliance & Permits Section

WMB:CAAdams:nay:8-11-83 (2559H)

M/S 533

AUG 11 1983

State of Oregon
Department of Environmental Quality
Willamette Valley Regional Office
895 Summer Street N. E.
Salem, Oregon 97301

Re: Public Notice for Termination of Interim Status, Reliance Universal,
Incorporated, Rhone-Poulenc Chemical Company, Western Kraft Paper Group,
Hercer Industries, American Can Company

Dear To Whom It May Concern:

Enclosed is a public participation package for proposed termination of
interim status for storage and treatment of hazardous wastes at the above
references facilities.

Please maintain this package for viewing by interested individuals for the
duration of the 45-day public comment period scheduled to commence on Friday,
August 12, 1983 and end Monday, September 26, 1983.

If you have any questions, please call me at (206) 442-2806. Thank you for
your assistance.

Sincerely,

Carrie Adams
RCRA Compliance & Permits Section

WMB:CAAdams:nay:8-11-83 (2559H)

AUG 11 1983

Public Notice for Termination of Interim Status, Reliance Universal, Incorporated, Rhone-Poulenc Chemical Company, Western Kraft Paper Group, Mercer Industries, American Can Company

Carrie Adam
Environmental Protection Specialist

Al Goodman
Oregon Operations Office

Enclosed is a public participation package for proposed termination of interim status for storage and treatment of hazardous wastes at the above references facilities.

Please maintain this package for viewing by interested individuals for the duration of the 45-day public comment period scheduled to commence on Friday, August 12, 1983 and end Monday, September 26, 1983.

If you have any questions, please call me at (206) 442-2806. Thank you for your assistance.

WMB:CAAdams:nay:8-11-83 (2559H)

M/S 533

AUG 11 1983

NOTICE OF INTENT TO NOT ISSUE A PERMIT
FOR STORAGE AND TREATMENT OF HAZARDOUS
WASTE AND TO TERMINATE INTERIM STATUS

To All Interested Persons/Organizations:

The U.S. Environmental Protection Agency proposes to not issue a Resource Conservation and Recovery Act (RCRA) permit and to terminate interim status for storage and treatment of hazardous waste at each of the following facilities:

Reliance Universal, Incorporated Salem, Oregon
Rhone-Poulenc Chemical Company, Portland, Oregon
Western Kraft Paper Group, Beaverton, Oregon
Mercer Industries, Beaverton, Oregon
American Can Company, Salem, Oregon

Enclosed is a public notice for public comment and opportunity for public hearing on the proposed action. The public comment period will run from August 12, 1983 through September 26, 1983.

Comments on the proposed permit denial and termination of interim status are welcome and should be forwarded to Ms. Carrie Adams of our office, Mail Stop 533, at the above address.

WMB:CAAdams:nay:8-11-83 (2559H)

PUBLIC NOTICE
Notice of Intent to
Terminate Interim Status
Under the Resource Conservation and Recovery Act

The U.S. Environmental Protection Agency (EPA) hereby gives notice of intent to not issue a Resource Conservation and Recovery Act (RCRA) permit and to terminate interim status at the following facilities:

Reliance Universal, Inc.
ORD009412602

1660 Cross Street, SE.
Salem, Oregon 97309

Rhone-Poulenc Chemical Company
ORD990659492

6200 NW. St. Helen's Road
Portland, Oregon 97210

Western Kraft Paper Group
ORD009042250

5500 SW. Western
Beaverton, Oregon 97005

Mercer Industries
ORD047632823

10740 SW. Denney Road
Beaverton, Oregon 97005

American Can Company
ORD009044520

8334 Industrial Way, NE.
Salem, Oregon 97303

Background Information

The listed facilities originally notified EPA of onsite hazardous waste storage and/or treatment activity, and subsequently filed RCRA Part A applications. Over the past year EPA requested RCRA Part B applications in order to issue RCRA permits to these facilities. The facilities have decided not to apply for RCRA permits and, therefore, EPA is now in the process of terminating their ability to operate under interim status.

Mercer Industries, Inc., Rhone-Poulenc, Inc., Reliance Universal, Inc. and American Can Company have tentatively been determined exempt from EPA permit requirements under 40 CFR 270.1(c)(2)(i) - generators who accumulate hazardous waste onsite for less than 90 days. The termination of interim status for these facilities means that the facility must ship hazardous wastes, within 90 days, to another facility that is authorized to treat, store or dispose of the wastes. The effect of this action will be to terminate the ability of a facility to indefinitely store hazardous waste. Future storage beyond the 90 days will be prohibited until the facility obtains a full RCRA Part B permit.

Mercer Industries, Inc. and Rhone-Poulenc, Inc. also operate tanks for the treatment of process waste water which are exempt from RCRA permit requirements under 40 CFR 270.1(c)(2)(v) - owners and operators of waste water treatment units. The tank treatment process and accumulation activity at Western Kraft Paper Group is also excluded from RCRA permit regulations by this exemption.

Western Kraft Paper Group has also changed the waste generating process such that the waste no longer meets the definition of hazardous waste which was originally listed on the company's Part A application. The waste may exhibit a concentration of lead or chromium that would characterize the waste as hazardous; however, as long as the waste is accumulated in the waste water treatment unit, the RCRA permit requirements do not apply. If, when removed from the treatment unit, the waste is determined to meet the characteristics of a hazardous waste under State of Oregon Department of Environmental Quality or EPA hazardous waste definitions, the facility may still store the waste in containers or tanks for up to 90 days, without a RCRA permit, under 40 CFR 270.1(c)(2)(i).

Except for Western Kraft Paper Group, none of the facilities have stopped handling hazardous waste. Some have changed their hazardous waste handling procedures in order to eliminate the need to store beyond 90 days. These facilities must continue to comply with Oregon State regulations for onsite accumulation of hazardous waste. Since Oregon has received RCRA Phase I Interim Authorization, the Federal regulations for generators do not apply. However, the State regulations should be substantially equivalent to EPA regulations governing accumulation for less than 90 days as specified in 40 CFR 262.34(a).

Applicable regulatory exemptions and procedural changes have been documented in letters between the facilities and EPA, and are available for public review as noted below. For facilities which have adjusted handling procedures since the effective date of the RCRA regulations, these letters will serve as the closure plans required by 40 CFR Part 265, Subpart G.

Public Comment

Copies of facility requests for termination of interim status and pertinent EPA regulations governing such termination are available for review at:

U.S. Environmental Protection Agency, Region 10
Library - 12th Floor, Park Place Building
1200 Sixth Avenue
Seattle, Washington

U.S. Environmental Protection Agency
Oregon Operations Office
Yeon Building, 2nd Floor
522 SW. Fifth Avenue
Portland, Oregon

Salem Central Library
585 Liberty SE.
Salem, Oregon

State of Oregon
Department of Environmental Quality
Willamette Valley Regional Office
895 Summer Street NE.
Salem, Oregon

Beaverton Public Library
4550 SW. Hall Boulevard
Beaverton, Oregon

Interested persons are invited to submit written comments concerning the proposed permit denials and interim status terminations for EPA's consideration. Public comments will be accepted for 45 days after the posting of this notice. Persons with questions may contact Carrie Adams of EPA's Regional Office in Seattle, Washington at (206) 442-2806, or Richard Reiter of the Oregon Department of Environmental Quality in Portland, Oregon at (503) 229-5913.

A public hearing can be scheduled, to discuss the proposed action at a particular facility, if significant public interest is expressed. The decision on whether there is significant public interest in holding the hearing will be based on the receipt of written notice of opposition and written request for a public hearing. Even if a hearing is not held, all written comments will be considered in making a final decision on this proposed action. Please send comments, requests for public hearing or written requests for copies of public notice documents to:

Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, M/S 533
Seattle, Washington 98101
Attn: Carrie Adams



Ernesta B. Barnes
Regional Administrator

AUG 12 1983

Date to be published

File: Rhone-Paulenc

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF: M/S 533

August 9, 1983

Mr. Lon Achenbach
KEX Radio Station
~~2130 S.W. Fifth Avenue~~ 4949 S.W. Macadam
Portland, Oregon 97201

Dear Mr. Achenbach:

As we discussed on the telephone August 8, 1983, enclosed is a 30-second announcement to be run two times on each station, KEX AM and KQFM FM, on Friday, August 12, 1983; once on each station during morning drive time and once on each station during evening drive time. Also enclosed is an Environmental Protection Agency voucher authorizing \$109.00 for the morning announcements and \$83.00 for the evening announcements. These announcements may be run any time after August 12th as PSA's.

Please submit an Affidavit of Performance showing air times with your billing after the broadcast date.

Thank you very much for your assistance. If you have any questions, please call me at (206) 442-2804.

Sincerely,

Judith W. Fey
RCRA Compliance and Permits Section

Enclosures

30 - SECOND ANNOUNCEMENT

THE ENVIRONMENTAL PROTECTION AGENCY (EPA) PROPOSES TO NOT ISSUE RESOURCE CONSERVATION AND RECOVERY ACT PERMITS TO AND TO TERMINATE INTERIM STATUS FOR STORAGE AND/OR TREATMENT OF HAZARDOUS WASTE AT WESTERN KRAFT PAPER GROUP AND MERCER INDUSTRIES IN BEAVERTON, OREGON AND RHONE-POULENC CHEMICAL COMPANY IN PORTLAND, OREGON. INFORMATION REGARDING THE PERMIT DENIALS MAY BE REVIEWED AT THE BEAVERTON PUBLIC LIBRARY OR EPA'S OREGON OPERATIONS OFFICE IN PORTLAND. THE PUBLIC COMMENT PERIOD WILL RUN FROM AUGUST 12, 1983 THROUGH SEPTEMBER 26, 1983. IF YOU BELIEVE A PUBLIC HEARING SHOULD BE HELD ON THIS MATTER, CONTACT EPA, BEFORE SEPTEMBER 26TH, BY CALLING (206) 442-2806 OR BY WRITING EPA AT 1200 - 6TH AVENUE, MAIL STOP 533, SEATTLE, WASHINGTON, 98101, ATTENTION: CARRIE ADAMS.

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE U.S. Environmental Protection Agency (EPA)		For Agency Use Only
PLACE VOUCHER PREPARED Seattle, Washington		VOUCHER NUMBER
DATE PREPARED August 9, 1983		SCHEDULE NUMBER
NAME OF PUBLICATION KEX Radio Station		PAID BY
NAME OF PUBLISHER OR REPRESENTATIVE Lon Achenbach		
ADDRESS (Street, room number, city, State, and ZIP code) 2130 S.W. Fifth Avenue 4949 S.W. Macadam Portland, Oregon 97201 (503) 225-1190		

CHARGES

TYPEFACE		(size of type)	(inch, square, word, or folio)
		POINT PER	
Line Rates		NUMBER OR LINES (Indicate counted or space)	COST PER LINE
	FIRST INSERTION		\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
Other Rates		NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT
	FIRST INSERTION		\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
Attach one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.			TOTAL LINE RATES AND OTHER RATES
			LESS DISCOUNT AT %
			BALANCE DUE \$
			VERIFIED (Initials)

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION	PAID BY CHECK NUMBER
6830200 NBR267 3A8010N00H Est. Cost: \$192.00, 2 @ \$109.00 2 @ \$ 83.00	

ADVERTISING ORDER

83-AV-0119

ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U. S. Environmental Protection Agency (EPA)

DATE

August 9, 1983

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

Radio Station

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE ~~PUBLICATION~~ ADVERTISED IN

KEX Radio Station

SUBJECT OF ADVERTISEMENT

Public Notice - Draft RCRA Permit Denials See "Specifications" below

NUMBER OF TIMES ADVERTISEMENT APPEARED

Four times

DATE(s) ADVERTISEMENT APPEARED

Friday, August 12, 1983

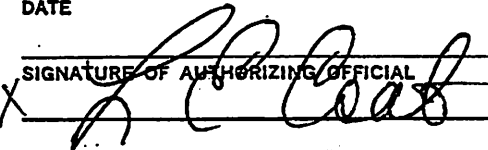
SPECIFICATIONS FOR ADVERTISEMENT

Once on each AM and FM during morning drive time and

Once on each AM and FM during evening drive time

Total of four announcements.

COPY FOR ADVERTISEMENT

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	5 USC 302 & EPA 1210.5	NUMBER	5 USC 302 & EPA 1210.5
DATE		DATE	
SIGNATURE OF AUTHORIZING OFFICIAL		TITLE	Deputy Regional Administrator

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC,
D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 8:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶.....

1200 Sixth Avenue (M/S 313) 1 copy
Seattle, WA 98101

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

NOTING CHECKLIST

Rhone-Poulenc
term 1.5. / deny permit

	Draft Permit	Statement of Basis	Public Notice	Adm. Record	30-Second Announce.	Cover Letter	Ad Order	Express Mail
Salem Central Library		✓	✓	✓		✓		
Beverton Public		✓	✓	✓		✓		
Operations Office OOS		✓	✓	✓		✓		
State main Office		✓	✓	✓		✓		
Willamette Valley Reg.		✓	✓	✓		✓		
Applicant		original	✓			original		
PAT Team								
File Copy		yellow	yellow			yellow		
Oregonian Newspaper			✓				original	✓
Oregon Statesman			✓				original	✓
Radio KEX Station KSCM					✓		original	✓
Environmental Groups								
Finance M/S 313							✓	
Purchasing M/S 352							✓	
Public Notice Log			✓		✓		✓	
Headquarters Steve Levy								
Region 10 Info. Center		✓	✓	✓		✓		

✓ = copy

Public Notice Publication Date: Friday, August 12, 1983

Public Comment Period: Monday, September 26, 1983

Public Hearing Date:

RHÔNE-POULENC CHEMICAL COMPANY

AGROCHEMICAL DIVISION

6200 N.W. St. Helens Road - Portland, Oregon 97210 - Telephone: (503) 222-3571 - Telex: 36-0329

December 10, 1982

[RRB-305-82]

Mr. Paul Day
Environmental Protection Agency
Region X
1200 Sixth Ave.
Seattle, WA 98011

RECEIVED
DEC 14 1982
TECHNICAL OPERATIONS SECTION

Dear Mr. Day:

RE: Portland Plant, RCRA Interim Status
Withdrawal; EPA ID No. ORD 990659492

Recently a review has been made of the Portland operation in light of the number of amendments made to the RCRA Regulations 40 CFR Parts 261 to 265. We are requesting the withdrawal of the Interim Status Hazardous Waste Permit application submitted in November 1980.

The changes in the regulations that allow this request and the changes in our operation are outlined below.

FROM 3, Part III. PROCESS CODES & DESIGN CAPACITY

1. Line Nos. 1 & 3:

The storage of wastes has been less than 90 days for the last year. Generation volumes have decreased from 1980 levels, permitting prompt shipment to the disposal facility.

2. Line No. 2:

Tank S02 contains wastewater K-099, 2,4-D process water. The storage is for one to three days, therefore exempt.

3. Line Nos. 4 & 5:

Treatment T-01 is neutralization of wastewater to a pH of 7 to 9. This treatment is exempt.

Treatment T-04 is an activated carbon treatment that is a "closed treatment system" and therefore is exempt.

Mr. Paul Day
EPA, Region X

[2]

December 10, 1982
[RRB-305-82]

FORM 3, Part IV. DESCRIPTION OF HAZARDOUS WASTE

1. Line Nos. 1, 2, & 3:

K043, F002, and D001 storage is less than 90 days.

2. Line No. 4:

D001 storage is less than 90 days.

3. Line Nos. 5 & 6:

U140, U081 (should have been D001) ignitable waste - alcohols; containing 2,4-dichlorophenol. Volume reduced, stored less than 90 days.

4. Line No. 8:

P035 (now V240) 2,4-D acid: Material on carbon from activated carbon water treatment process which is a closed process.

5. Line No. 9:

P002 (should have been D002) corrosive wastes generation reduced and stored less than 90 days.

6. Line No. 10:

K043, 2,6-DCP was stored but has been beneficially recycled. When disposed of, stored for less than 90 days.

If you have any questions please feel free to contact me.

Yours very truly,

R. R. Briggs

R. R. Briggs
Plant Manager

RRB:s11

cc:

C. Clinton, DEQ

E. L. Clark

R. F. Gitschlag

R. J. Rosenberg

R. L. Ferguson

G. Q. Garza

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE
TELEPHONE CALLS, INCOMING OR OUTGOING,
AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM: Judy Fey

TITLE: E.P. Specialist

LOCATION &
PHONE NO.: AWMD 2-2804

DATE: 9/17/82

TIME: 1:30 PM

CALL TO: Robert Briggs

TITLE: Rhone-Poulenc Chemical Co.

LOCATION &
PHONE NO.: Portland, OR (503) 222-3571

SUMMARY OF CALL:

I called to verify the "unit of Measure:"
on Process Design Capacity portion of
Part A for 501 and T01. Mr. Briggs
was uncertain and will call back.

3:03 PM, same day. Mr. Briggs stated
that the 501 should be 350 barrels which
is 19,250 Gallons and T01 has a total
capacity of 13000 Gallons but a flow rate
of 144,000 Gallons per Day

Judith W. Fey
(Signature)

Phil Scott

6/29/82

Based on the information supplied, the Rhone-Poulenc Agrochemical Division will need a Federal RCRA permit to treat, store, or disposed of hazardous waste.

Annually, at least 880,500 lbs. of waste are generated and stored at this facility. Six hundred thousand pounds of the total amount is directly attributable to the production of 2,4D (K043 36 Dichlorophenol). The remainder of the waste is comprised of;

- D001 } 26140
 } 41081
 - an ignitable residue resulting from using isobutanol to clean 2,4-D tanks;
- 41086
 - the residue from phenol spills;
- P005 D002, D016
 - and contaminated carbon (exhibiting corrosivity) used to absorb 2,4D and,
- D001
 - ignitable material.

The misc. corrosive wastes previously listed as P002 (and tentatively changed to D002) were not included in the total stated above because of the strong possibility that it may be excluded under the "Elementary neutralization" exemption stated in part 265(c)(10).

Other comments indicate that the storage exemption is not habitually fulfilled. Also, there is no acknowledgement that any of the solvents are reclaimed.

TELEPHONE USE REPORT

TO BE USED ON ALL LONG DISTANCE
TELEPHONE CALLS, INCOMING OR OUTGOING,
AND ANY LOCAL CALLS MERITING RECORDING

PREPARE IMMEDIATELY - SUBMIT DAILY

ROUTING

CALL FROM:

Phil Scott

TITLE:

LOCATION &
PHONE NO.:

442-2867

DATE:

6/30/87

CALL TO:

Robert BRIGGS

TIME:

PM

TITLE:

LOCATION &
PHONE NO.:

Phone Poulenc Chemicals

SUMMARY OF CALL:

MR. Briggs confirmed that the attached revision. Filtered out
by Linda Dawson is accurate. It was noted by
the rep. that they should have submitted a revised
Part A. I informed him that he would receive
written correspondence detailing necessary revisions.

Phillip Scott
(Signature)

RHÔNE-POULENC CHEMICAL COMPANY

AGROCHEMICAL DIVISION

6200 N.W. St. Helens Road - Portland, Oregon 97210 - Telephone: (503) 222-3571 - Telex: 36-0329

March 27, 1981

[RRB-084-81]

Environmental Protection Agency
Region X
1200 Sixth Ave., M/S 530A
Seattle, WA 98101

Attention Ms. Donna Schwartz

Dear Ms. Schwartz:

Attached please find copies of the U.S.G.S. maps for Linnton, OR and Portland, OR-WA showing our plant site and an area of one mile surrounding the plant as requested during our telephone conversation on March 17, 1981. It was necessary to include both maps as a portion of the plant site is shown on each.

We have provided the approximate outline of the plant facility on each map and indicated the location of our NPDES discharge.

Sincerely,



R. R. Briggs
Plant Manager

RRB:s11
Enclosure
cc:
G. Q. Garza
R. F. Gitschlag

10-79

METRO-79

25-43



9-1

110 000 FEET
(WASH.)

T. 2 N.
T. 1 N.

5049
LINNTON 2.4 MI.

5048

35'

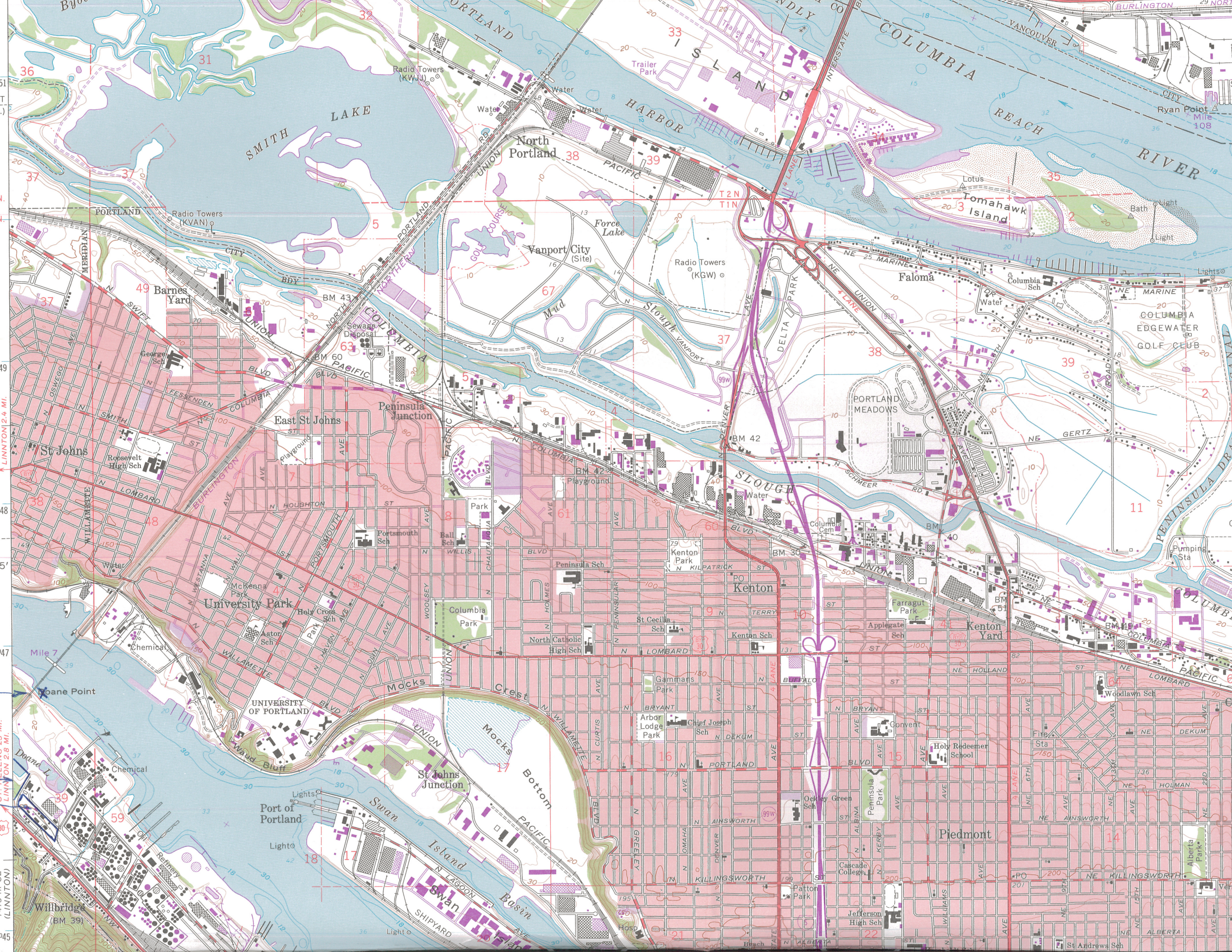
5047

ST. HELENS 23 MI.
LINNTON 2.8 MI.

1475 III SE
(LINNTON)
5045

NPDES PERMIT No. 2652-J

RHONE POULENC INC
PLANT SITE

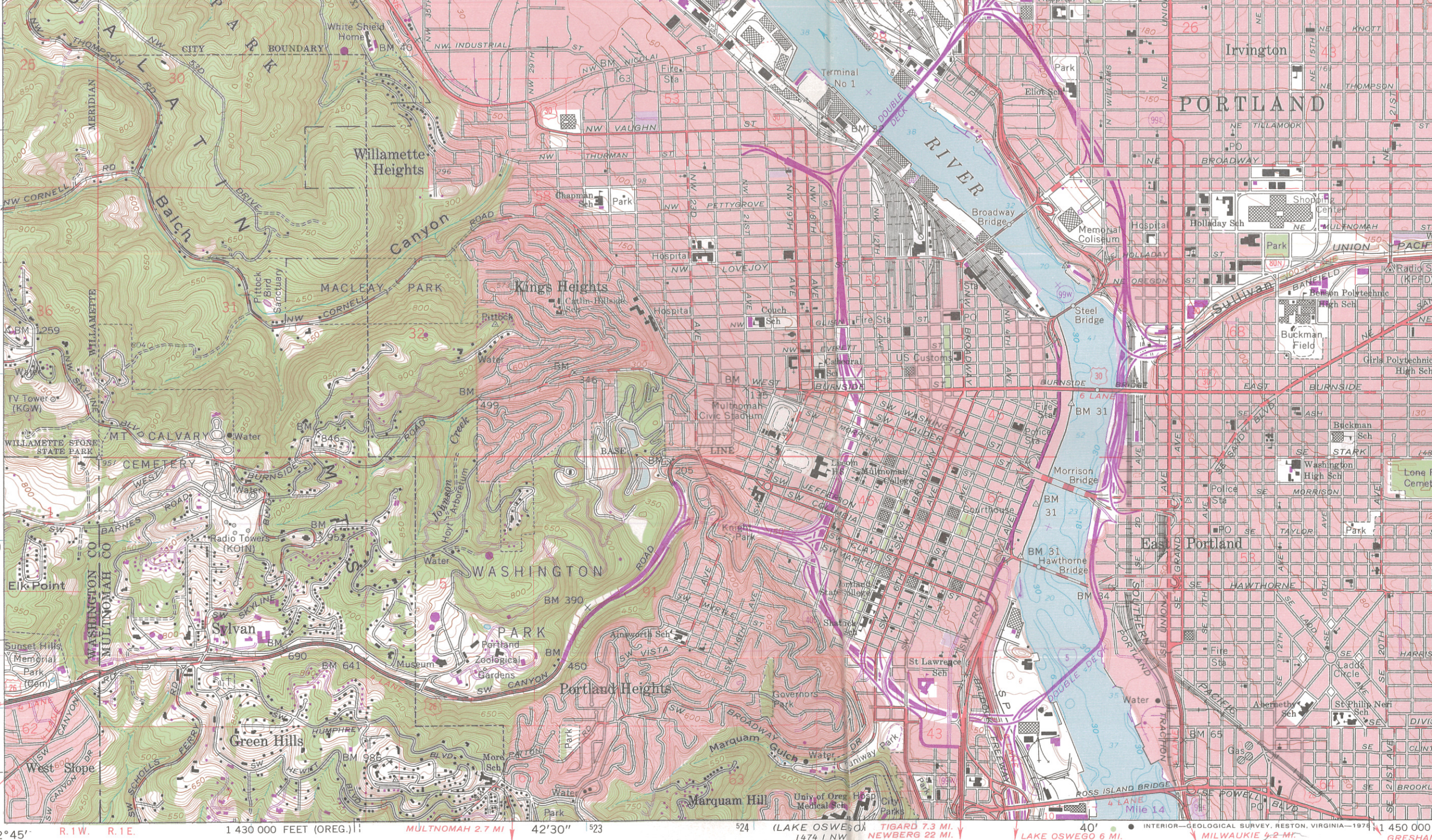


5043
32°30'
690 000 FEET
(OREG.)
5042
5041
5040
45°30'
122°45'

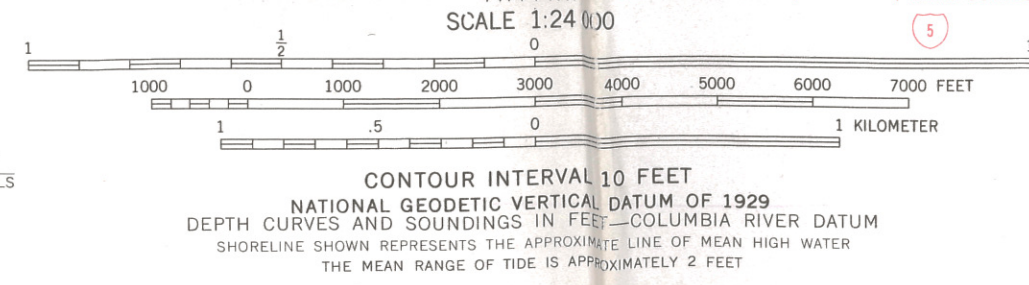
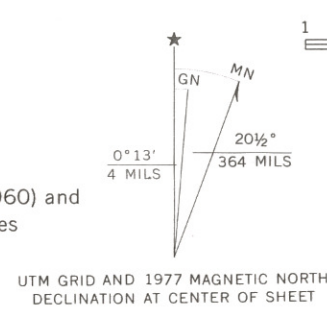
RED TINT INDICATES AREAS IN WHICH ONLY LANDMARK BUILDINGS ARE SHOWN

DASHED LAND LINES INDICATE APPROXIMATE LOCATIONS

CEAR WILL 3 MI.
BANKS 20 MI.
NORTH PLAINS 14 MI.
HILLSBORO 13 MI.
BEAVERTON 3 MI.



Mapped, edited, and published by the Geological Survey
Control by USGS, NOS/NOAA, and State of Oregon
Topography from aerial photographs by photogrammetric methods and by planetable surveys. Culture and drainage in part by USC&GS
Aerial photographs taken 1951. Field checked 1954
Revised from aerial photographs taken 1960. Field checked 1961
Selected hydrographic data compiled from NOS/NOAA Charts 6155 (1960) and 6156 (1959). This information is not intended for navigational purposes
Polyconic projection. 1927 North American datum
10,000-foot grids based on Oregon coordinate system, north zone and Washington coordinate system, south zone
1000-meter Universal Transverse Mercator grid ticks, zone 10, shown in blue
Red tint indicates areas in which only landmark buildings are shown
Dashed land lines indicate approximate locations

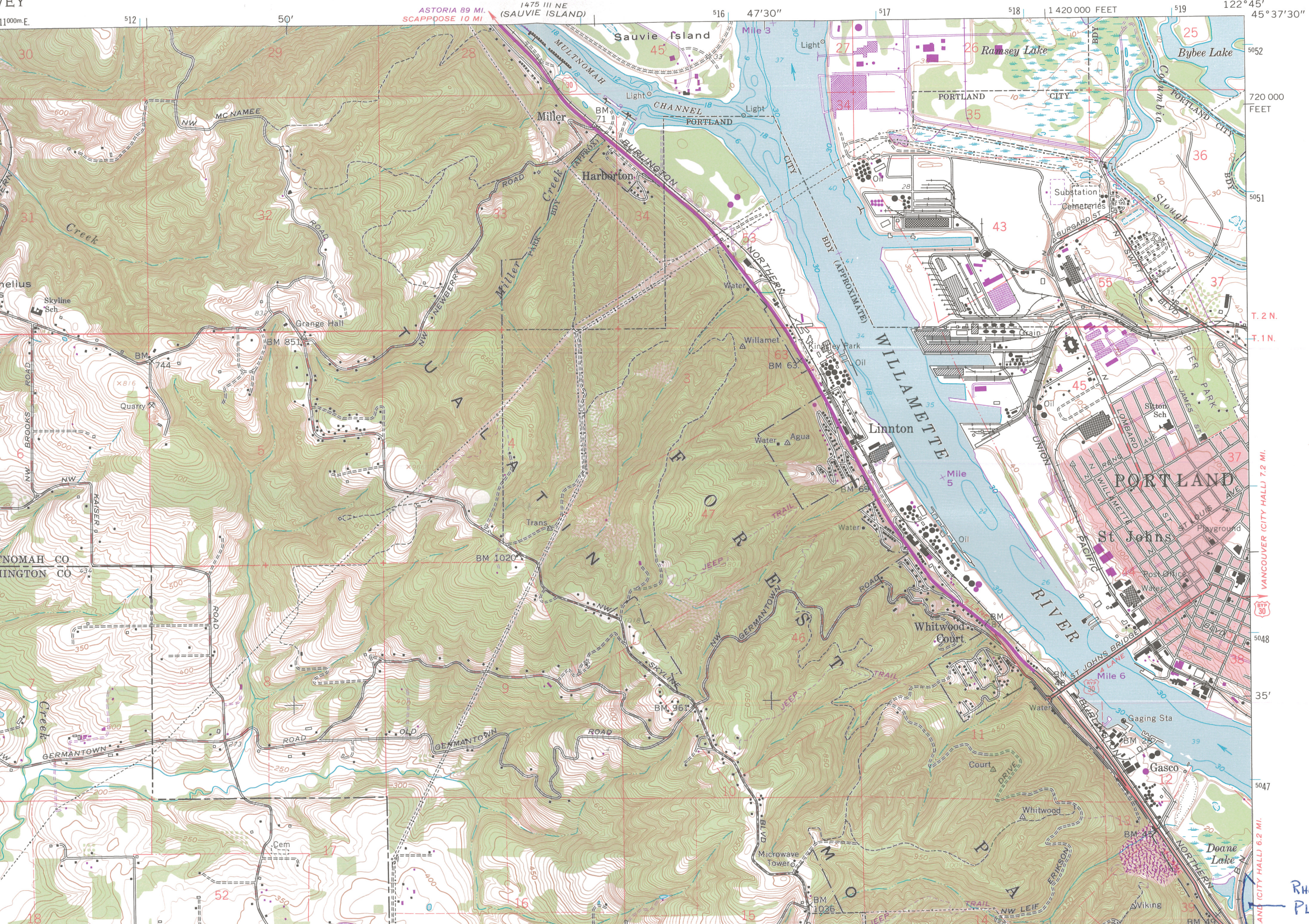


THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

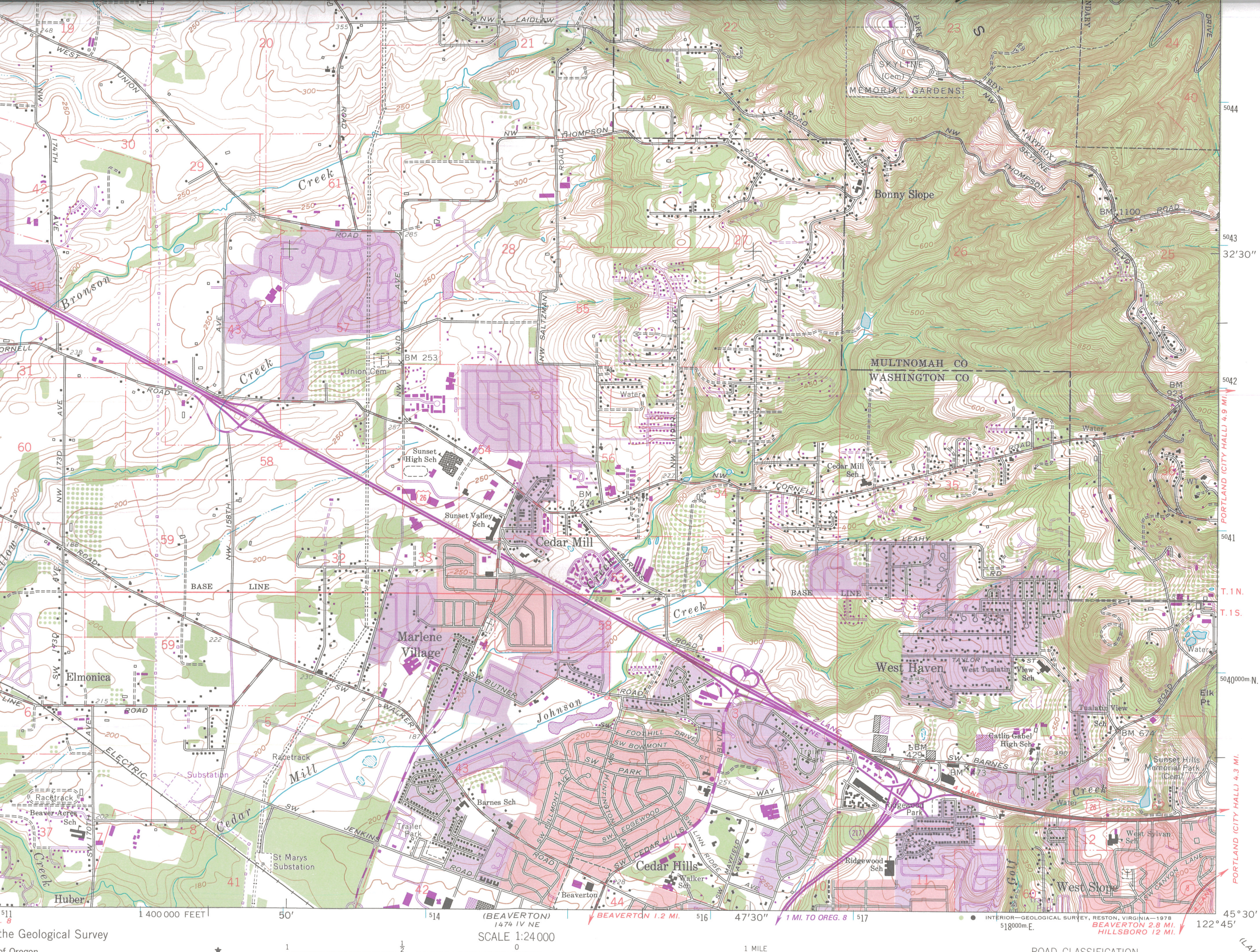
CAPTAIN'S
CAPTAIN'S NAUTICAL SUPPLIES
817 S.W. 2nd
PORTLAND, OREGON 97204
503-277-1648

QUADRANGLE LOCATION

Revisions shown in purple compiled from aerial photographs taken 1970 and 1975. This information not field checked
Map edited 1977
Purple tint indicates extension of urban areas




Rhone Poulenc Inc.
PLANT SITE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 1/9/84

SUBJECT: Part A Data Entry

FROM: Judy Fey 
Information Management

TO: File

As a result of continued efforts on the part of the region to reconcile their data base with that of H.Q., process codes were added for the following facilities:

Reliance Universal	S01	43,000	G
✓ <u>Rhone-Poulenc</u>	S02	385,000	G
Gustafson Chemical	S02	27,000	G

74040/✓

LD. ^{Ft. Lewis}
WA 8214053995

Part A

Does not have existence date.

✓ ^{Reliance} ORD 009412602
✓ ^{Rhone-Poulenc} ORD 990659492
^{Gustafson} IDD 092034784

S01 43000 G
Does not have process codes in.
S02 385'000 G " "
S02 27,000 G " "
code At. Unit

s/T ^{Fairchild} WA 9571924647

✓ 430101
Does not Have Existence Date

s/T ^{Wadsworth} WAD 010195725

✓ Delete
Has Code 9 in Non-Regulated

s/T ^{Puget Sound Naval Shipyard} WA 2170023418

✓ 740101
Does not have Existence Date

^{Western Pac.}
WAD 000643593

Does not have ~~Fac~~ Status Ind. ✓

ITEM NUMBER

*II. A First Application

1. Existing Facility Date (on or before November 19, 1980) ☐
2. New Facility Date (after November 19, 1980) ☐

*III. Processes

- A. Process Code ☐
- B. Process Design Capacity-Amount
1. Amount ☐
2. Unit of Measure ☒ *SOI, TO I
incorrect*

*IV. Description of Hazardous Wastes

- A. EPA Hazardous Waste Number ☐
- B. Estimated Annual Quantity ☐
- C. Unit of Measure ☐
- D. Processes
1. Process Codes ☒ *TOI appears
IN III but not in
IV*
2. Process Description ☐

V. Facility Drawing ☐VI. Photographs ☐VII. Facility Geographic Location ☐

VIII. Facility Owner

- *1. Name of Facility's Legal Owner ☐
2. Phone ☐
- *3. Street or P.O. Box ☐
- *4. City or Town ☐
- *5. State ☐
6. Zip Code ☐

*IX. Owner Certification

- A. Name ☐
- B. Signature ☐
- C. Date Signed ☐

*X. Operator Certification

- A. Name ☐
- B. Signature ☐
- C. Date ☐

Comments:

Form 3 is missing ☐

[illegible][illegible]

this
version
with
form

☐ ACKNOWLEDGEMENT SENT

X

INTERNAL CHECKLIST

☒ Approved for Phase I
Acknowledgement

Rhone - Paulenc

1. Interim Regulatory Requirements

A. (1) FORM 1 MISSING ☐

(2) FORM 3 MISSING ☐

B. POSTMARK after NOVEMBER 19, 1980 ☐ Valid ☐

C. (1) DATE of OPERATION MISSING ☐

(2) DATE of OPERATION after NOVEMBER 19, 1980 ☐

D. (1) NOTIFIED after AUGUST 18, 1980 ☐ Valid ☐
2 Non Notifier ☐ VALID ☐

E. (1) FORM 1, XIII B SIGNATURE MISSING ☐

(2) FORM 3, IX B SIGNATURE MISSING ☐

2. A. **FSD** ☐

B. NONREGULATED ☐

C. UNSURE ☐

D. UNKNOWN FACILITY
(missing name and address on Form 3) ☐

E. NEW FACILITY ☐

F. CORE ITEM(S) MISSING ☐

G. NON-CORE ITEM(S) MISSING ☐

H. OTHER ☐

Rhone Poulenc ORD 996659492

ITEM NUMBER

II. Pollutant Characteristics ☐*III. Name of Facility ☐IV. Facility Contact ☐

V. Facility Mailing Address

A. Street or P.O. Box ☐B. City or Town ☐C. State ☐D. Zip Code ☐

VI. Facility Location

*A. Street, Route Number ☐B. County Name ☐*C. City or Town ☐*D. State ☐E. Zip Code ☐F. County Code (if known) ☐VII. SIC Codes (other than Process and Hazardous Waste) ☐

VIII. Operator Information

*A. Name ☐*B. Is the name listed in VIII-A also the owner ☐C. Status of operator ☒D. Phone ☐*E. Street or P.O. Box ☐*F. City or Town ☐*G. State ☐H. Zip Code ☐IX. Indian Land ☐X. Existing Environmental Permits ☐XI. Map ☒XII. Nature of Business ☐

XIII. Certification

A. *1. Name and ☐2. Official Title ☐*B. Signature ☐*C. Date Signed ☐

Comments:

Form 1 is missing ☐

Items preceded by * must be submitted by _____.

OK
connected/phone callOK
submitted/phone
request

OWNER: Rhone Poulenc Chemicals Co.
FACILITY: Agrochem Division
LOCATION: Portland, OR REVIEWER: Carrie DATE: 4/17/81

BASED ON PART A APPLICATION, EPA WILL REQUEST PART B APPLICATION FOR:

TREATMENT STORAGE DISPOSAL
PRIORITY CLASSIFICATION: 1 2 3 4 5
comments: state NPDES OR-000174-1 This is a major NPDES
expiring 8/82 - Could be a good candidate for
consolidation
A&HM PRIORITY RANKING 37 comments:

IS WASTE CURRENTLY REGULATED? YES NO

IS WASTE LISTED AS "ACUTELY HAZARDOUS"? YES NO

identify: U140 isobutyl alcohol P035 2,4 D
U081 2,4-Dichlorophenol P002 1-acetyl-2-thiourea
U188 phenol

IS WASTE STORED LONGER THAN 90 DAYS? YES NO

IS THIS AN EXISTING LAND DISPOSAL FACILITY? YES NO

DOES FACILITY QUALIFY AS SMALL QUANTITY GENERATOR? YES NO

IS THIS A ^{NEW} RECYCLING FACILITY? YES NO

STATUS-- INTERIM? YES NO

IF NO, IS FACILITY NEW? YES NO

LATE FILER? YES NO

P035 & P002 are treated by activated carbon
treatment system for waste water
(P035 now listed as U-240)^(P)